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3 November 1987

MEMORANDUM FOR: Executive Officer, OMS

25X1 FROM:

[REDACTED]
Acting Chief, Safety Division
Office of Medical Services

SUBJECT: Comments Regarding H.R. 162,
High Risk Occupational Disease
Notification and Prevention Act of 1987

1. In response to your request for Safety Division's comments regarding the subject H.R. Bill, and OCA's request for OMS review and comments, the following is submitted:

a. If H.R. 162 becomes law, there is no question it will create an increased workload for this division's Occupational Health Branch. However, I should point out that this division is currently engaged in managing or overseeing five programs consistent with the provisions of H.R. 162, which are as follows:

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d. All Agency facilities are provided Material Safety Data Sheets (MSDS) which delineate the specific hazards of chemicals utilized at each facility. Copies of each MSDS are kept in a master file in the Occupational Health Branch. In addition to the above, Personal Protective Equipment in the form of eye goggles, boots, coveralls, aprons, etc., are provided to employees when and where required.

e. The Agency manages a medical surveillance program for Allied employees exposed to asbestos insulation during minor repair work throughout the Headquarters Building due to the variable nature of their work requirements and the large amounts of bulk asbestos insulation still in the Headquarters Building. The Occupational Safety and Health Act (OSHA) Asbestos Standard (29 CFR 1910.1001), mandates medical surveillance program requirements for employees occupationally exposed to asbestos. While the Allied employees are not technically "occupationally exposed", this program is an added precautionary measure taken by the Agency.

f. The Safety Division conducts noise surveys at Agency Communications facilities during the conduct of safety and health surveys. Each noise survey results in communications facilities being assigned a "noise dose", which is then annotated in the medical file of each communicator assigned to the facility surveyed. In addition, communications officers are required to have annual audiograms completed by OMS, or in lieu of annual audiograms, an audiogram each time the communicator returns to Headquarters for home leave.

2. The five programs cited in subparagraphs b through f above, should provide you a flavor of what this division is currently engaged in within the risk assessment arena. I should also point out, that the Agency is far from in compliance with the various federal statutes with respect to employee notification and recordkeeping due to the lack of resources. This situation will no doubt be exacerbated if this act becomes law.

3. Assuming H.R. 162 does become law and when the Risk Assessment Board established by this act identifies work populations at risk, the Safety Division will do the utmost to notify affected employees as appropriate.

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4. Lastly, it is perceived that this act will have an impact on OMS entities other than Safety Division. For example, I envision increased workloads for CAD, MOD and the EH&PMO, as a result of this act's promulgation into law. The act does not currently identify the work populations at risk that are required to be notified; however, the Risk Assessment Board will no doubt do so if/when this act becomes law.

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